

JORDAN D. SEGALL (State Bar No. 281102)
jordan.segall@mto.com

MARK R. YOHALEM (State Bar No. 243596)
mark.yohalem@mto.com

ROBIN S. GRAY (State Bar No. 316544)
robin.gray@mto.com

MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

*Attorneys for Defendant Walt Disney
Pictures*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ARTHUR LEE ALFRED, II et al.,

Plaintiffs,

v.

WALT DISNEY PICTURES,

Defendant,

Case No. 2:18-CV-08074-CBM-ASx

**DECLARATION OF ROBIN S.
GRAY IN SUPPORT OF
DEFENDANT WALT DISNEY
PICTURES' MOTION FOR
SUMMARY JUDGMENT**

Date: October 19, 2021

Time: 10:00 a.m.

Dept: Courtroom 8B

Judge: Hon. Consuelo Marshall

DECLARATION OF ROBIN S. GRAY

I, Robin S. Gray, hereby declare:

1. I am admitted to practice before all of the courts of the State of California and this Court. I am an attorney at the law firm of Munger, Tolles & Olson LLP and counsel of record for Defendant Walt Disney Pictures in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, I could and would testify competently to the matters set forth herein

2. Attached here as **Exhibit A**, and lodged in physical format with the Court as described in the concurrently filed Notice of Lodging, is a true and correct copy of the 2003 motion picture *Pirates of the Caribbean: The Curse of the Black Pearl*.

3. Attached here as **Exhibit B** is a true and correct copy of excerpts of the transcript of the deposition of Plaintiffs' expert David Román, which was taken on May 27, 2021 and August 18, 2021.

4. Attached here as **Exhibit C** is a true and correct copy of excerpts of the transcript of the first day of the deposition of Defendant's expert James McDonald, which was taken on June 16, 2021.

5. Plaintiffs attached a copy of their *Pirates of the Caribbean* screenplay (the "Screenplay") as an exhibit to their original complaint. See ECF No. 1-1. I have read and am familiar with the contents of the Screenplay.

6. Additionally, I have watched the footage of the Pirates of the Caribbean theme park ride that is being submitted as exhibits to the concurrently filed declarations of David Jessen (Exhibit A) and Diego Parras (Exhibit B), and I have reviewed *The "E" Ticket* magazine issue published in Fall 1999 about the Pirates of the Caribbean theme park ride.

